

Message

From: Gutierrez, Raul [Gutierrez.Raul@epa.gov]
Sent: 2/20/2015 4:25:32 PM
To: Honker, William [honker.william@epa.gov]
CC: Watson, Jane [watson.jane@epa.gov]; Martinez, Maria [Martinez.Maria@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Davis, Suea [davis.suea@epa.gov]
Subject: RE: Spanish Lake

I'll ask for the credit worksheets to see how they were rated and determined. One thing to mention is that New Orleans can't use the MCM, at least using FY15 funds. It was slipped into the FY15 budget at the last minute, so right now we're scrambling trying to figure out how to determine the amount of compensatory mitigation needed for permits under review. The Corps has not issued any permits due to the lack of suitable method to determine the compensatory mitigation requirement. If MCM doesn't come back, then the bank will have to go through another credit valuation in the future.

EPA did participate in the development of MCM. I don't know if there is any specific guidance that credit reevaluations for active mitigation banks has to be done in conjunction with EPA. I'd be interested to see what guidance he is referring to, and I'll keep looking to see if I find it. We do comment on credit valuations for banks that are in development, but the IRT hasn't gone ack to all of the older active banks to redo their credits.

From: Honker, William
Sent: Thursday, February 19, 2015 2:49 PM
To: Gutierrez, Raul
Cc: Watson, Jane; Martinez, Maria; Garcia, David; Davis, Suea
Subject: Spanish Lake

Raul,

Tim Hardy called regarding Spanish Lake today. Latest issue is a revised valuation of the mitigation bank using the MCM that the Corps apparently did at some point that greatly reduced the value of the bank as compared with the earlier (2008) valuation which used the WVA method. Tim also said he found some guidance that the Corps was supposed to do such valuations in concert with EPA (?)

Can you do some checking on these points and then we (you, Jane, Maria, and I) can catch up sometime next week by phone?

Thanks.

Bill

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